REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-10, 12, 13, 15, 17-28, and 33 are pending in this application. Claims 1, 19, 23, and 33 are amended by the present amendment.

Amendments to the claims find support in the application as originally filed, at least at Applicants' Figure 12, and in the specification at page 19, lines 9-16. Thus, no new matter is added.

In the outstanding Office Action, Claims 1, 2, 4, 5, 7, 8, 10, 12, 13, 15, 17, 18, 23, 26-28, and 33 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent 6,990,238 to Saffer et al. (herein "Saffer") in view of Xia Lin (herein "Lin"); Claims 3, 6, 9, 19, 20, 24, and 25 were rejected under 35 U.S.C. § 103(a) as unpatentable over Saffer, Lin, and U.S. Patent No. 6,446,061 to Doerre et al. (herein "Doerre"); and Claims 21 and 22 were rejected under 35 U.S.C. § 103(a) as unpatentable over Saffer in view of Lin, Doerre, and U.S. Patent 5,977,992 to Branscomb.

Applicants respectfully traverse the rejection of Claims 1, 2, 4, 5, 7, 8, 10, 12, 13, 15, 17, 18, 23, 26-28, and 33 under 35 U.S.C. § 103(a) as unpatentable over Saffer and Lin, with respect to amended independent Claims 1, 19, 23, and 33.

Amended Claim 1 is directed to an information retrieval apparatus that includes, in part, a mapping processor and a display processor. The display processor is operable to display a representation of at least some of the positions of an array which correspond to identified information items as an n-dimensional display of display points within a display area of a graphical display. The display area corresponds to at least a portion of the array. Further, the display processor is operable to generate data representative of an indication which is displayed as a direction indicating symbol on the graphical user interface. The

direction indicating symbol provides a user with a relative direction within the n-dimensional space of the location of a second cluster within the same hierarchical level which is outside the display area. The direction indicating symbol can be used to navigate to the second cluster within the n-dimensional display. Independent Claim 19 includes similar features directed to a video acquisition and processing apparatus, independent Claim 23 includes similar features directed to a method of retrieving and displaying information, and independent Claim 33 includes similar features directed to a computer readable medium including computer program instructions which cause a computer to execute a method of retrieving and displaying information.

Applicants Figure 12 shows a non-limiting example of an embodiment of Claim 1. In this example, arrows 444, 446, and 448 (e.g., direction indicating symbols) are provided to direct the user to clusters of information items which are at the same hierarchical level as the "quiz" cluster being displayed in the second display area.[1]

Applicants respectfully submit that Saffer and Lin, whether taken individually or in combination, fail to teach or suggest each of the features of the amended independent claims. For example, Saffer and Lin fail to teach a display processor that generates, for display on a graphical user interface, a direction indicating symbol, and fail to teach or suggest generating a direction indicating symbol that provides a relative direction within the n-dimensional space of the location of a second cluster within the same hierarchical level which is outside the display area. Further, Saffer and Lin fail to teach or suggest displaying data representing a number of information items within a cluster that is indicated by the direction indicating symbol.

[1] Specification at page 19, lines 9-11.

Saffer describes a data process, analysis, and visualization system that determines and displays the relative content and context of related information.[2] Further, Saffer indicates that a visual tool for viewing information is a "galaxy view" that is a "two dimensional scatter graph in which records are organized and depicted in groups (or 'clusters') based on relationships between one record and another."[3] In other words, Saffer only indicates that clusters may be displayed in a "galaxy view." In addition, Saffer indicates that groups of related records may be selected on a map and may be highlighted in a galaxy view.[4] In other words, Saffer indicates that records may be displayed in a galaxy view including all the records. Thus, according to Saffer, all the clusters of related data may be displayed on a two dimensional display with the relative direction from one cluster to another being apparent by the relative positions of the clusters within the display area. However, Saffer fails to suggest a direction indicating symbol that indicates a relative direction to a second cluster. Further, Saffer fails to indicate a situation in which a second cluster is outside the display area, and Saffer fails to suggest displaying, with respect to the direction indicating symbol, data that represents a number of information items within the indicated second cluster. Further, it is respectfully submitted that Lin also fails to teach or suggest the claimed features lacking in the disclosure of Saffer.

Further, since Saffer displays each of the clusters within the display area to show their apparent position with respect to one another, there is no reason why one of skill in the art might be motivated to modify Saffer to add a direction indicating symbol indicating a relative direction of a second cluster. Thus, the claimed features are also non-obvious variations that are not suggested by Saffer.

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[2] Saffer at Abstract.
[3] Saffer at column 20, lines 58-64.
[4] Saffer at column 21, lines 64-67.

Moreover, Applicants respectfully submit that Saffer does not describe or otherwise suggest that a user may wish to navigate to another cluster from a cluster that is displayed. In particular, Saffer merely teaches identifying relationships within a data set by viewing different visualizations of that data to identify existing relationships.[5] Further, it is respectfully submitted that visualizing relationships between data does not require traversing the data or navigating from one data cluster to another. Accordingly, there is also no reason why one of skill in the art would have been motivated to modify Saffer to include the claimed navigation features, and any contrary assertion would likely be based on impermissible hindsight reasoning.

Accordingly, Applicants respectfully submit that Saffer and Lin, whether taken individually or in combination, fail to teach or suggest "the display processor is operable to generate data representative of an indication which is displayed as a direction indicating symbol on the graphical user interface providing a user with a relative direction within the n-dimensional space of the location of a second cluster within the same hierarchical level which is outside the display area and can be used to navigate to the second cluster within the n-dimensional display," as recited in Claim 1, and as similarly recited in independent Claims 19, 23, and 33.

Further, it is respectfully submitted that Saffer and Lin also fail to teach or suggest "the graphical user interface is operable to display the direction indicating symbol indicating the relative direction of the second cluster within the display area of the graphical display with respect to a position of the first cluster in the display area, and the data representing the number of information items within the cluster is displayable with respect to the direction indicating symbol," as recited in Claim 1, and as similarly recited in independent Claims 19, 23, and 33.

[5] Saffer at column 2 line 23-51 and column 20 line 5-32.

Accordingly, Applicants respectfully submit that independent Claims 1, 19, 23, and 33, and claims depending therefrom, patentably define over Saffer and Lin.

In addition, Applicants respectfully traverse the rejections of Claims 3, 6, 9, 19-22, 24, and 25 under 35 U.S.C. § 103(a) as unpatentable over Saffer in view of Lin and Doerre or Branscomb.

Claims 3, 6, 9, 19-22, 24, and 25, depend from independent Claims 1, 19, 23, and 33, which as discussed above are believed to patentably define over Saffer and Lin. Further, it is respectfully submitted that Doerre and Branscomb fail to teach or suggest the claimed features lacking in the disclosures of Saffer and Lin.

Accordingly, it is respectfully requested the rejections of Claims 3, 6, 9, 19-22, 24, and 25 under 35 U.S.C. § 103(a) also be withdrawn.

Therefore, Applicants respectfully submit that independent Claims 1, 19, 23, and 33, and claims depending therefrom, are allowable.

Consequently, in light of the above discussion and in view of the present amendment, this application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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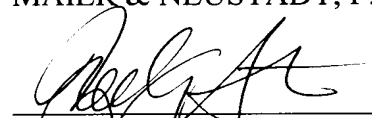

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